

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
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In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised
that a court action has been filed in the U.S. District Court San Diego on the following Patents or Trademarks:

DOCKET NO. 08-CV-0385-DMS(NLS)	DATE FILED 02/29/2008	U.S. DISTRICT COURT Southern District of California
PLAINTIFF Park		DEFENDANT CAS Enterprises, Inc.
PATENT OR TRADEMARK NO.	PATENT OR TRADEMARK NO.	PATENT OR TRADEMARK NO.
1 SEE COMPLAINT	6	11
2 6,637,988	7	12
3 7,134,814	8	13
4	9	14
5	10	15

In the above-entitled case, the following patent(s)/trademark(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading		
PATENT OR TRADEMARK NO.	PATENT OR TRADEMARK NO.	PATENT OR TRADEMARK NO.	
1	6	11	
2	7	12	
3	8	13	
4	9	14	
5	10	15	

In the above-entitled case, the following decision has been rendered or judgment issued:

DECISION/JUDGMENT <i>attached</i>		
CLERK W. Samuel Hamrick, Jr.	(BY) DEPUTY CLERK <i>W. Samuel Hamrick, Jr.</i>	DATE 10/14/2010

FILED

08 FEB 29 AM 11:05

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: CP DEPUTY

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16 UNITED STATES DISTRICT COURT
17 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

18 JOON PARK, an individual,
19 Plaintiff,

20 v.

21 CAS ENTERPRISES, INC.,
22 an Iowa Corporation d/b/a
23 KREG TOOL COMPANY,

24 Defendant.

Civil No.: '08 CV 0385 DMS NLS

COMPLAINT FOR PATENT
INFRINGEMENT

Jury Trial Demanded

25 Plaintiff, Joon Park for his Complaint against CAS Enterprises, Inc. d/b/a
26 Defendant Kreg Tool Company alleges:

27 THE PARTIES

28 1. Joon Park is an individual having an address at 1320 Virginia Avenue,
Glendale, California 91202.

2. CAS Enterprises, Inc. d/b/a Kreg Tool Company ("Kreg Tool") is an Iowa
corporation organized and existing under the laws of the State of Iowa with its principal
place of business at 201 Campus Drive, Huxley, Iowa 50124.

ORIGINAL

Complaint 1

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JURISDICTION

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the Patent Laws of the United States, 35 U.S.C. § 271. Personal jurisdiction of the Defendant is proper in this Federal District pursuant to 28 U.S.C. § 1391(c) in that Defendant has conducted business, committed acts of infringement and continue to commit acts of infringement in this District. Venue is proper in this district based on 28 U.S.C. § 1391(c).

BACKGROUND FACTS

4. On October 28, 2003, United States Patent No. 6,637,988 (the '988 patent) was duly and legally issued by the United States Patent and Trademark Office for an invention entitled Adjustable Pocket Drilling Fixture. Joon Park is the owner of the entire right, title and interest in and to the '988 patent. A true and correct copy of the '988 patent is attached hereto as Exhibit 1.

5. On November 14, 2006, United States Patent No. 7,134,814 (the '814 patent) was duly and legally issued by the United States Patent and Trademark Office for an invention entitled Adjustable Pocket Drilling Fixture based on a continuation-in-part application based on the application that matured into the '988 patent. Joon Park is the owner of the entire right, title and interest in and to the '814 patent. A true and correct copy of the '814 patent is attached hereto as Exhibit 2.

6. In late 2006, Kreg Tool, through its patent attorney, F.S. Farrell, LLC, offered to purchase the '988 and '814 patents. Joon Park informed Mr. Farrell that he, Joon Park, believed that a pocket hole drilling jig (Model K3) sold by Kreg Tool infringed the '988 and '814 patents; Mr. Farrell denied such charge of infringement. The parties were unable to reach an agreement for a license. Kreg Tool continues to sell the infringing pocket hole drilling fixture.

INFRINGEMENT OF THE '183 PATENT

7. Joon Park incorporates herein by reference Paragraphs 1 - 6.

8. Kreg Tool has infringed, contributed to infringement, induced

1 infringement, and continues to infringe the '988 and '814 patents. The infringing acts
2 include, but are not limited to, the manufacture, use, sale, importation, and offer for sale of
3 the Model K3 Kreg jig. Kreg Tool is liable for infringement of the '988 and '814 patents
4 under the provisions of 35 U.S.C. § 271.

5 9. The acts of infringement by Kreg Tool have caused financial injury to Joon
6 Park and Joon Park is entitled to recover from Kreg Tool damages sustained by Joon Park
7 as a result of the wrongful acts of Kreg Tool in an amount subject to proof at trial.

8 10. The infringement of the exclusive rights of Joon Park has caused
9 irreparable harm to Joon Park for which there is no adequate remedy at law, and unless
10 enjoined by this Court Kreg Tool will continue to infringe the rights of Joon Park.

11 11. Kreg Tool had knowledge of the charge of infringement of the '988 and
12 '814 patents by Joon Park to Kreg Tool, yet Kreg Tool chose to continue to infringe the
13 patents in blatant disregard of the patent rights of Joon Park. The infringement by Kreg
14 Tool of the '814 and '988 patents is willful and deliberate and entitles Joon Park to
15 increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in
16 prosecuting this action under 35 U.S.C. §285.

17 **DEMAND FOR JURY TRIAL**

18 Joon Park demands trial by jury on all issues triable by a jury.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff Joon Park requests entry of judgment in its favor against
21 Kreg Tool as follows:

22 A. A declaration that Kreg Tool has infringed United States Patent Nos.
23 7,134,814 and 6,637,988.

24 B. A preliminary and permanent injunction enjoining Kreg Tool and its
25 officers, agents, employees, and those acting in privity with it, from further infringement,
26 contributory infringement and/or inducing infringement of U.S. Patent Nos. 7,134,814 and
27 6,637,988.

28 C. An award of damages arising out of the infringement of U.S. Patent Nos.

1 7,134,814 and 6,637,988 by Kreg Tool including enhanced damages pursuant to 35 U.S.C.
2 § 284, together with prejudgment and post-judgment interest in an amount according to
3 proof.

4 D. An award of attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise
5 permitted by law.

6 E. For such other costs and further relief as this Court may deem just and
7 proper.

8 Dated this 28th day of February, 2008.

9 Respectfully submitted,

10 THE ADAMS LAW FIRM

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13 By 

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JOON PARK, AN INDIVIDUAL,

PLAINTIFF,

VS.

CAS ENTERPRISES, INC.
AN IOWA CORPORATION
D/B/A KREG TOOL COMPANY


DEFENDANT.

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) CIVIL NO. 08-CV-0385 DMS NLS
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) **ORDER GRANTING JOINT MOTION**
) **TO DISMISS**
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Pursuant to the Stipulation of Dismissal of All Claims With Prejudice entered into between Plaintiff, Joon Park, an individual, and Defendant, CAS Enterprises, Inc. d/b/a Kreg Tool company, a corporation organized and existing under the laws of the State of Iowa, and good cause appearing therefore, IT IS HEREBY ORDERED that all pending claims in the above-captioned matter are hereby dismissed, with prejudice, and the parties are hereby dismissed, with prejudice, from this lawsuit, with each party to pay its own attorney fees and costs.

Dated this 1 day of September, 2010.

2010.



UNITED STATES DISTRICT COURT JUDGE